

Michael D. Rounds
Nevada Bar No. 4734
Ryan J. Cudnik
Nevada Bar No. 12948
Steven A. Caloiaro
Nevada Bar. No. 12344
WATSON ROUNDS
10000 West Charleston Blvd., Ste. 240
Las Vegas, Nevada 89135
Telephone: (702) 636-4902
Facsimile: (702) 636-4904
E-Mail: mrounds@watsonrounds.com
rcudnik@watsonrounds.com
scaloiaro@watsonround.com

*Attorneys for Defendant
and Counterclaimant
GALAXY GAMING, INC.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AGS, LLC, a Delaware limited liability
company; RED CARD GAMING, INC., a
Nevada corporation,

Plaintiffs and Counter-Defendants,
v.

GALAXY GAMING, INC., a Nevada
corporation,

Defendant and Counterclaimant.

Case No. 2:14-cv-02018-JAD-CWH

**STIPULATION REGARDING RULE 26(f)
DISCOVERY PLAN AND [PROPOSED]
ORDER REGARDING RULE 16(b)
SCHEDULING ORDER**

Pursuant to Rules 26(f) and 26(a)(1)(B)(viii)-(ix) of the Federal Rules of Civil Procedure and Local Rule 26-1, Plaintiffs and Counter-Defendants AGS, LLC (“AGS”) and Red Card Gaming, Inc. (“Red Card”) (collectively, “Plaintiffs”), by and through their counsel, Holland & Hart LLP, and Defendant and Counterclaimant Galaxy Gaming, Inc. (“Galaxy” or “Defendant”), by and through its counsel Watson Rounds, hereby stipulate and agree as follows:

The parties have filed competing motions for preliminary injunction. (Dkt. #8; Dkt. #15). Defendant also filed a Motion to Compel Arbitration (Dkt. #24), and Plaintiffs filed a Limited Opposition thereto (Dkt. #38) that did not dispute the arbitration provision in the September 21, 2012 Asset Purchase Agreement (“APA”) between Red Card and Galaxy. All of these motions are scheduled for hearing on April 6, 2015. The current substantive issues in those motions to be decided by this Court relate to (i) the parties’ motions for preliminary injunction, which have been fully briefed, and (ii) which tribunal should decide the motions for preliminary injunction. Defendants additionally filed multiple Motions to Seal (Dkt. #14, 19, 23, 47, 54), and Plaintiffs additionally filed a Motion to Strike Defendant’s Reply (Dkt. #60).

Accordingly, the parties stipulate and agree that discovery in this District Court action should be stayed, and that no Scheduling Order is necessary, at this time. Plaintiffs and Defendant each reserve the right to request, and this Stipulation is without prejudice to such a request (if any), for discovery and/or a scheduling order in this matter should the need arise, for example, due to the parties’ competing motions for preliminary injunction and/or Plaintiffs’ Motion to Strike.

DATED: March 10, 2015

HOLLAND & HART LLP

/s/ Ryan Loosvelt
Robert C. Ryan (7164)
Tamara Reid (9840)
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511

Bryce K. Kunitomo (7781)
Ryan Loosvelt (8550)
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
Attorneys for Plaintiffs

WATSON ROUNDS

/s/ Ryan J. Cudnik
Michael D. Rounds (4734)
Ryan J. Cudnik (12948)
Steven A. Caloiaro (12344)
10000 West Charleston Blvd., Suite 240
Las Vegas, Nevada 89135
Attorneys for Defendant

ORDER

IT IS SO ORDERED. The parties are directed to file a joint status report within ten days of the district judge deciding either the pending motion to compel arbitration (doc. # 24) or the motions for preliminary injunction (docs. # 8, # 15).

DATED: April 17, 2015



United States Magistrate Judge

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date a true and correct copy of the foregoing document, **STIPULATION REGARDING RULE 26(f) DISCOVERY PLAN AND [PROPOSED] ORDER REGARDING RULE 16(b) SCHEDULING ORDER**, will be served upon counsel of record via electronic mail through the United States District Court's CM/ECF system.

DATED March 10, 2015

/s/ Jeff Tillison
An Employee of Watson Rounds